

Mountain Valley Pipeline, LLC
v. Easements to Construct, etc., et al.

Exhibit 2

Letter dated September 7, 2021

PENNSTUART

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September 7, 2021

VIA EMAIL AND MAIL

Cerid E. Lugar
Lugar Law
7533 Williamson Road
Roanoke, VA 24019

Re: Mountain Valley Pipeline, LLC v. Easements to Construct, etc., et al.
Civil Action No. 7:17-cv-492-EKD

Dear Cerid:

On behalf of Mountain Valley Pipeline, LLC ("MVP"), I am responding to your letter of September 5, 2021, objecting to a subpoena for documents that MVP issued to Kay Leigh Ferguson.

As you are aware, Ms. Ferguson was one of the protestors on the Terry property on August 11, 2021, who interfered with work on the project by refusing to move a safe distance from blasting. Because explosives were already loaded, the action of the protestors was a danger to themselves and the workers. The action was also a violation of the Court's Order Granting Immediate Possession, and MVP has filed a motion to enforce that Order.

All of the information sought in the subpoena is relevant to the pending motion, and the information should be produced without further delay. The boilerplate objections served by MS. Ferguson are not valid and only obstruct a lawful subpoena. As a result, MVP will be filing a motion for an order compelling production.

Should Ms. Ferguson be willing to honor the subpoena and avoid a motion to compel, please let me know.

Very truly yours,



Wade W. Massie

WWM/jf

cc: Seth M. Land, Esq.